

Steve W. Berman (*pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com

RODGER R. COLE (CSB No. 178865)
rcole@fenwick.com
FENWICK & WEST LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041
Telephone: 650.988.8500
Facsimile: 650.938.5200

Bruce L. Simon (SBN 96241)
PEARSON SIMON & WARSHAW, LLP
44 Montgomery Street, Suite 2450
San Francisco, CA 94104
Telephone: (415) 433-9000
Facsimile: (415) 433-9008
bsimon@pswlaw.com

TYLER G. NEWBY (CSB No. 205790)
tnewby@fenwick.com
ANNASARA G. PURCELL
(CSB No. 295512)
apurcell@fenwick.com
FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104
Telephone: 415.875.2300
Facsimile: 415.281.1350

Plaintiffs' Interim Co-Lead Counsel

[Additional signatures below]

*Attorneys for Defendant
Carrier iO, Inc.*

[Additional signatures below]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re Carrier IQ, Inc. Consumer Privacy Litigation

Case No. C-12-md-2330-EMC

[This Document Relates to All Cases]

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO FILE
SETTLEMENT AGREEMENT AND
CONTINUING PRELIMINARY
APPROVAL HEARING DATE**

STIPULATION EXTENDING TIME TO FILE
MOTION FOR PRELIMINARY APPROVAL

Case No. C-12-md-2330-EMC

1 This Stipulation and [Proposed] Order is entered into between Plaintiffs' Interim Co-Lead
2 Counsel ("Plaintiffs") and counsel for defendants Carrier IQ, Inc., HTC America, Inc., HTC
3 Corporation, Huawei Devices USA, Inc., LG Electronics MobileComm U.S.A, Inc., LG
4 Electronics, Inc., Motorola Mobility LLC, Pantech Wireless, Inc., Samsung Electronics America,
5 Inc., and Samsung Electronics Co., Ltd ("Defendants").

6 WHEREAS, the current deadline for Plaintiffs to file a motion for preliminary settlement
7 approval is January 15, 2016;

8 WHEREAS, a hearing on Plaintiffs' anticipated motion for preliminary settlement
9 approval is currently on calendar for January 28, 2016;

10 WHEREAS, the parties have reached agreement on all terms and language of a settlement
11 agreement, but have not yet been able to obtain signatures from each party or an appropriate
12 representative of each party;

13 WHEREAS, the parties anticipate that by January 22, 2016, each party will be able to
14 obtain the necessary signatures;

15 WHEREAS, continuing the hearing on Plaintiffs' motion for preliminary settlement
16 approval will allow the court adequate time to review the motion and settlement agreement in
17 light of later filing date;

18 WHEREAS, February 16, 2016 at 2:00 p.m. is currently available for a hearing on the
19 Court's calendar;

20 NOW, THEREFORE, Plaintiffs and Defendants, by and through their respective counsel
21 of record, hereby stipulate, subject to Court approval, as follow:

22 Plaintiffs' motion for preliminary settlement approval shall be filed on or before January
23 22, 2016. The hearing on Plaintiffs' anticipated motion is continued to February 16, 2016 at 2:00
24 p.m.

25 || Dated: January 15, 2016

By: /s/ Robert F. Lopez

Steve W. Berman

Steve W. Bernick
Robert F. Lopez

ROBERT F. LOPEZ
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300

1 Seattle, WA 98101
2 Telephone: (206) 623-7292
3 Facsimile: (206) 623-0594
4 steve@hbsslaw.com
5 robl@hbsslaw.com

6 By: /s/ Daniel L. Warshaw
7 Daniel L. Warshaw
8 PEARSON SIMON & WARSHAW, LLP
9 15165 Ventura Blvd., Suite 400
10 Sherman Oaks, CA 91403
11 Telephone: (818) 788-8300
12 Facsimile: (818) 788-8104
13 dwarshaw@pswlaw.com

14
15 Bruce L. Simon
16 Robert G. Retana
17 PEARSON SIMON & WARSHAW, LLP
18 44 Montgomery Street, Suite 2450
19 San Francisco, CA 94104
20 Telephone: (415) 433-9000
21 Facsimile: (415) 433-9008
22 bsimon@pswlaw.com
23 rretana@pswlaw.com

24 *Plaintiffs' Interim Co-Lead Counsel*

25 By: /s/ Tyler G. Newby
26 Rodger R. Cole
27 rcole@fenwick.com
28 FENWICK & WEST LLP
801 California Street
Mountain View, CA 94041
Ph: (650) 988-8500
Fax: (650) 938-5200

29
30 Tyler G. Newby
31 tnewby@fenwick.com
32 FENWICK & WEST LLP
33 555 California Street, 12th Floor
34 San Francisco, CA 94104
35 Telephone: (415) 875-2300
36 Facsimile: (415) 281-1350

37
38 *Attorneys for Defendant Carrier iQ, Inc.*

1 By: /s/ Rosemarie T. Ring
2

3 Rosemarie T. Ring
4 Rose.Ring@mto.com
5 Jonathan H. Blavin
6 Jonathan.Blavin@mto.com
7 Bryan H. Heckenlively
8 Bryan.Heckenlively@mto.com
9 MUNGER, TOLLES & OLSON, LLP
10 560 Mission Street
11 Twenty-Seventh Floor
12 San Francisco, CA 94105-2907
13 Telephone: (415) 512-4000
14 Facsimile: (415) 512-4077

15 Henry Weissmann
16 Henry.Weissmann@mto.com
17 MUNGER, TOLLES & OLSON, LLP
18 355 South Grand Avenue,
19 Thirty-Fifth Floor
20 Los Angeles, CA 90071-1560
21 Telephone: (213) 683-9100
22 Facsimile: (213) 687-3702

23 *Attorneys for Defendants HTC America, Inc., and*
24 *HTC Corporation*

25 By: /s/ Simon J. Frankel
26

27 Simon J. Frankel
28 sfrankel@cov.com
COVINGTON & BURLING LLP
1 Front St., 35th Floor
San Francisco, CA 94111
Telephone: (415) 591-6000
Facsimile: (415) 591-6091

29 *Attorneys for Defendant Huawei Device USA, Inc.*

30 By: /s/ Wilson W. Lin
31

32 Wilson W. Lin
33 WLIn@park-law.com
34 H.C. Park & Associates, PLC
35 1894 Preston White Drive
36 Reston, VA 20191
37 Telephone: (703) 544-9230
38 Facsimile: (703) 288-5139

39 *Attorneys for Defendant Pantech Wireless, Inc.*

1 By: /s/ Lance A. Etcheverry

2 Lance A. Etcheverry
3 lance.etcheverry@skadden.com
4 SKADDEN ARPS SLATE MEAGHER & FLOM
5 LLP
6 300 South Grand Avenue, Suite 3400
7 Los Angeles, California 90071
8 Telephone: (213) 687-5000
9 Facsimile: (213) 687-5600

10 S. Sheryl Leung
11 sheryl.leung@skadden.com
12 SKADDEN ARPS SLATE MEAGHER & FLOM
13 LLP
14 525 University Avenue, Suite 1400
15 Palo Alto, California 94301
16 Telephone: (650) 470-4544
17 Facsimile: (650) 798-6605

18 *Attorneys for Defendants Samsung Electronics*
19 *America, Inc. and Samsung Electronics Co., Ltd.*

20 By: /s/ Jeff E. Scott

21 Jeff E. Scott
22 ScottJ@gtlaw.com
23 Lori Chang
24 ChangL@gtlaw.com
25 Rebekah Guyon
26 GuyonR@gtlaw.com
27 GREENBERG TRAURIG, LLP
28 1840 Century Park East, Suite 1900
Los Angeles, CA 90067-2121
Telephone: 310-586-7700
Facsimile: 310-586-7800

29 Ian C. Ballon
30 Ballon@gtlaw.com
31 GREENBERG TRAURIG, LLP
32 1900 University Avenue, 5th Floor
33 East Palo Alto, CA 94303
34 Telephone: 650-328-8500
35 Facsimile: 650-328-8508

36 *Attorneys for Defendants LG Electronics, Inc. and*
37 *LG Electronics MobileComm U.S.A., Inc.*

1 By: /s/ Krista M. Enns
2

3 Christopher J. Letkewicz
4 cletkewicz@winston.com
5 WINSTON & STRAWN LLP
6 35 W. Wacker Drive
7 Chicago, IL 60601-9703
8 Telephone: (312) 558-5600
9 Facsimile: (312) 558-5700

10 Krista M. Enns
11 kenns@winston.com
12 WINSTON & STRAWN LLP
13 101 California Street
14 San Francisco, CA 94111-5894
15 Telephone: (415) 591-1000
16 Facsimile: (415) 591-1400

17 *Attorneys for Defendant Motorola Mobility LLC*

18 **[PROPOSED] ORDER**

19 Pursuant to Stipulation, it is SO ORDERED.

20 DATED: 1/19/2016



ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Tyler G. Newby, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO FILE SETTLEMENT AGREEMENT AND CONTINUING PRELIMINARY APPROVAL HEARING DATE**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: January 15, 2016

/s/ Tyler G. Newby

Tyler G. Newby

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2016, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have caused to be mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

Dated: January 15, 2016

/s/ Tyler G. Newby

Tyler G. Newby